

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:15-CR-151-O

ROBIE LYNN SIMS (28)

FACTUAL RESUME

SUPERSEDING Count One: Concealing a Person from Arrest
INFORMATION: (in violation of 18 U.S.C. § 1071)

PENALTY: \$250,000 fine - not more than 5 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not more than 3 years.

MAXIMUM PENALTY:

\$250,000 fine and not more than five (5) years imprisonment, plus a term of supervised release of not more than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Superseding Information are as follows:

First: That the defendant knew that a federal arrest warrant had been issued;

Second: That the defendant engaged in physical acts that aided the fugitive in avoiding detection and apprehension; and

Third: That the defendant intended to prevent the fugitive's discovery.

STIPULATED FACTS:

On June 25, 2015, at approximately 4:00 p.m., agents/officers with the Drug Enforcement Administration (DEA) and the United States Marshal's Service (USMS) Fugitive Squad interviewed Robie Lynn Sims at the residence located at xxxx Tacoma Drive, White Settlement, Texas. Robie Lynn Sims stated that she was the girlfriend of Billy Bullitt and that she was currently living at the residence located at xxxx Tacoma Drive. TFO Perry Moore then informed Robie Lynn Sims that Billy Bullitt had an outstanding Federal Arrest Warrant for Conspiracy to Distribute a Controlled Substance.

TFO Perry Moore then asked Robie Lynn Sims if she knew where Billy Bullitt was currently living. Robie Lynn responded that she had last seen Billy Bullitt approximately two weeks ago at the residence located at xxxx Tacoma Drive.

TFO Perry Moore then asked Robie Lynn Sims for consent to search the residence at xxxx Tacoma Street, which she granted. Officers/Agents then began a systematic search of the residence which resulted in the seizure of approximately 25 grams of marijuana, a digital scale, four small metal grinders and two letters, one addressed to Billy Bullitt and one to Billy and Robi at xxxx Tacoma Drive. TFO Perry Moore provided Robie Lynn Sims one of his DEA business cards that contained his office and cell phone numbers. TFO Perry Moore further asked Robie Lynn Sims to contact him with any additional information regarding Billy Bullitt's new residence. Robie Lynn Sims stated that she would contact TFO Perry Moore if Billy Bullitt contacted her in the future.

On June 25, 2015, at approximately 5:08 p.m., members of the White Settlement Police Department were dispatched to the residence of xxxx Tacoma Drive pursuant to a 911-call from the residence. Upon their arrival, officers spoke with the S. J., the owner of xxxx Tacoma Drive who said that when she came home she discovered a white male standing in the doorway of her daughter's bedroom. S. J. said that the white male told her his name was Billy Bullitt and that he was on the run. S. J. further said that Billy Bullitt told her that he had a wife, kids and a baby on the way. S. J. then said that she told Billy Bullitt that she did not care and wanted him out of her house. S. J. then said that Billy Bullitt left through the back door of her residence.

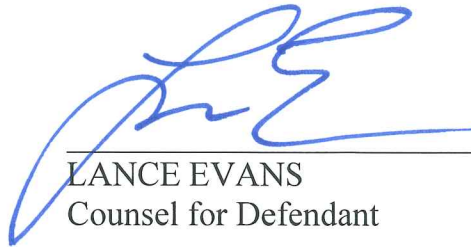
Billy Bullitt had in fact been living at xxxx Tacoma Street, and had fled the residence when agents/officers initially approached xxxx Tacoma Street. And Robie Sims had lied about Billy Bullitt's whereabouts, and had stalled the officers so that he would have time to flee the residence. Billy Bullitt broke into the residence at xxxx Tacoma Drive in order to avoid apprehension.

On July 2, 2015, agents/officers with the USMS Fugitive Squad located and arrested Billy Bullitt at the La Quinta Inn & Suites, room #xxx, xxxx Bryant Irvin Blvd, Fort Worth, Texas. At that time, agents/officers also located Robie Lynn Sims sleeping in the bed with Billy Bullitt. Robie Sims had arranged for another person to rent the room for her and Bullitt in order to avoid alerting authorities to Billy Bullitt's location.

SIGNED this 6th day of Oct., 2015.



ROBIE LYNN SIMS
Defendant



LANCE EVANS
Counsel for Defendant